

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

CIVIL ACTION NO.: 1:25-cv-00548-TDS-JLW

LATSHIA GUIFARRO,

Plaintiff,

vs.

LABORATORY CORPORATION OF
AMERICA HOLDINGS,

Defendant.

**DEFENDANT’S MOTION FOR
EXTENSION OF TIME TO MOVE,
SERVE AN ANSWER, OR
OTHERWISE PLEAD**

NOW COMES Defendant Laboratory Corporation of America Holdings (“Labcorp”), by and through its undersigned counsel, and pursuant to Rules 6(b) and 81(c) of the Federal Rules of Civil Procedure and Local Civil Rules 6.1(a), and 77.2, hereby moves this Court for a two (2)-week extension of time to move, serve an Answer, or otherwise plead to Plaintiff’s Complaint, up to and including August 11, 2025.

In support of this motion, Labcorp states as follows:

1. On July 1, 2025, Plaintiff, Latshia Guifarro (“Plaintiff”) filed her Complaint against Labcorp in the United States District Court for the Middle District of North Carolina (the “Complaint”). (ECF No. 1.)
2. Labcorp was served with the Complaint on July 7, 2025.
3. Pursuant to Rule 12(a)(1)(a)(i) of the Federal Rules of Civil Procedure, Labcorp’s Answer or other responsive pleading is due to be served no later than July 28,

2025; thus, the time has not yet expired for Labcorp to move, serve an Answer, or otherwise plead to Plaintiff's Complaint.

4. There is information which needs to be reviewed before the undersigned will be in a position to adequately prepare and serve responsive pleadings, and as such, Labcorp requires additional time to move, serve an Answer, or otherwise plead to Plaintiff's Complaint and requests an additional two (2) weeks, up to and including August 11, 2025, to do so.

5. On July 24, 2025, Plaintiff's counsel consented to a 2-week extension of time for Labcorp to move, serve an answer, or otherwise plead by e-mail.

6. Labcorp files this motion without waiving any defenses to the claims asserted by Plaintiff, whether substantive, procedural or otherwise, or conceding that Plaintiff has alleged claims upon which relief may be granted. Labcorp specifically reserves all of its defenses pursuant to Rule 12(b) of the Federal Rules of Civil Procedure.

7. This motion is not being made for the purpose of delay but is made based upon the need for time to prepare a response.

Labcorp respectfully requests that its motion for an extension of time to move, serve an answer, or otherwise plead be granted, and that Labcorp be allowed up to and including August 11, 2025, to move, serve an Answer, or otherwise plead to Plaintiff's Complaint.

Respectfully submitted, this the 25th day of July, 2025.

K&L GATES LLP

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*Counsel for Defendant Laboratory
Corporation of America Holdings*

CERTIFICATE OF SERVICE

The undersigned certifies that on July 25, 2025, a copy of the foregoing *Motion for Extension of Time to Move, Serve an Answer, or Otherwise Plead* was electronically filed with the Clerk of the Court using the Court's CM/ECF electronic service system, which will send notification of such filing to the following:

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